

# Karnes Law Office, PC

1860 Hawthorne Ave. NE ste 10  
Salem, Oregon 97301

Tel: (503) 385-8888  
Fax: (503) 385-8899

# 1648.1

Through 01-27-16

Printed 01-27-16

Managed by:

Hunsaker

RE: Hunsaker v. United States

Previous Balance: \$0.00

## SERVICES PROVIDED

Who Hours Amount

12-02-13	PC and fax from client. IRS sending notice of levy. Sent letter to IRS. (\$300/Hr)	KK	0.80	240.00
02-10-14	PC and fax from client re: IRS notice of levy. Draft and send letter to IRS re stay. (\$300/Hr)	KK	0.80	240.00
09-01-14	Meeting with clients regarding IRS ongoing collection efforts; options. PC to Eugene IRS office. LM. (\$300/Hr)	KK	0.60	180.00
12-05-14	Draft complaint. (\$300/Hr)	KK	2.60	780.00
12-09-14	Meeting with client re Levy; discussed litigation. We will file suit. (\$300/Hr)	KK	1.20	360.00
12-09-14	Serve summons and complaint. (\$115/Hr)	JN	1.20	138.00
01-12-15	Review defendant's answer. (\$300/Hr)	KK	0.40	120.00
02-03-15	Drive to and from hearing. (\$150/Hr)	KK	2.40	360.00
05-01-15	Prepare discovery responses, meet with clients to obtain docs; bate stamp. (\$125/Hr)	ER	3.20	400.00
05-04-15	Response to defendants' RFP and Rogs. (\$300/Hr)	KK	0.80	240.00
05-08-15	Depo prep with clients. (\$300/Hr)	KK	2.60	780.00
05-11-15	Depositions. (\$300/Hr)	KK	3.80	1,140.00
06-04-15	Prepare supplemental RFP responses. (\$125/Hr)	ER	1.20	150.00
08-17-15	Edit response to RFP; ROG's review docs. (\$300/Hr)	KK	0.60	180.00
09-24-15	Review MSJ; Research issues. (\$300/Hr)	KK	0.80	240.00
10-23-15	Response to msj. (\$300/Hr)	KK	2.60	780.00
12-18-15	Review defendant's trial memo. (\$300/Hr)	KK	0.40	120.00
12-18-15	Review defendant's witness and exhibit lists. (\$300/Hr)	KK	0.30	90.00
12-18-15	Review defendant's witness and exhibit lists. (\$300/Hr)	KK	0.30	90.00
01-02-16	Prepare and file witness and exhibit lists; (\$300/Hr)	KK	1.40	420.00
01-06-16	Drive to and from trial. (\$150/Hr)	KK	2.40	360.00
01-06-16	Witness prep with clients. (\$300/Hr)	KK	1.50	450.00
01-06-16	Witness prep with clients. (\$300/Hr)	KK	1.50	450.00
01-06-16	Trial; wrap up with clients. (\$300/Hr)	KK	3.80	1,140.00
01-13-16	Read opinion; call clients. (\$300/Hr)	KK	0.60	180.00

Total Hours: 37.80  
Total Services: \$9,628.00

## Summary of Services

Elizabeth Romersa (\$125/hr Paralegal)	4.40
Jacki Normand (\$115/hr Paralegal)	1.20
Keith Karnes (\$150/hr Associate)	4.80
Keith Karnes (\$300/hr Associate)	27.40

STATEMENT SUMMARY			
Previous Balance		0.00	
Payments Received		0.00	
Unpaid Previous Balance			0.00
New Services Provided		9,628.00	
New Advanced Costs		0.00	
Total New Charges			9,628.00
		AMOUNT DUE	\$9,628.00

**Rank & Karnes Law, PC**  
2701 12TH ST SE  
SALEM, OR 97302  
United States  
(503) 385-8888

**Rank & Karnes Law, PC**

**John & Cheryl Hunsaker**  
PO Box 809  
Turner, OR 97392  
United States

**Balance** \$261.00  
**Invoice #** 00112  
**Invoice Date** May 12, 2016  
**Payment Terms** Net 15  
**Due Date**

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**Hunsaker, John and Cheryl**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
02/08/2016	KK	Appt. w/Client	Discussed payoff of plan; reviewed claims	\$315.00	0.5	\$157.50
02/08/2016	ER	PC w/client	PC with client regarding the payoff amount of their chapter 13 case.	\$115.00	0.2	\$23.00
02/10/2016	ER	PC w/client	PC with client regarding the payoff for their chapter 13	\$115.00	0.3	\$34.50
02/10/2016	ER	Redacted Tax returns	Redacted 2013 tax returns and emailed them to the trustee.	\$115.00	0.4	\$46.00

Totals: **1.4** **\$261.00**

Time Entry Sub-Total:	\$261.00
<b>Sub-Total:</b>	\$261.00
<b>Total:</b>	\$261.00
<b>Amount Paid:</b>	\$0.00
<b>Balance Due:</b>	<b>\$261.00</b>

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**John & Cheryl Hunsaker**  
PO Box 809  
Turner, OR 97392  
United States

**Balance** \$2,899.00  
**Invoice #** 00526  
**Invoice Date** August 12, 2019  
**Payment Terms** Net 15  
**Due Date** August 27, 2019

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## Hunsaker

## Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
08/08/2016	KK	Draft Document	Appellees' response brief	\$315.00	4.8	\$1,512.00
04/05/2019	KK	Draft Document	Response brief.	\$315.00	2.8	\$882.00
Totals:					<b>7.6</b>	<b>\$2,394.00</b>

## Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
11/16/2016	KK	Filing Fee	9th Cir filing fee	\$505.00	1.0	\$505.00
Expense Total:						<b>\$505.00</b>

Time Entry Sub-Total:	\$2,394.00
Expense Sub-Total:	\$505.00
<b>Sub-Total:</b>	<b>\$2,899.00</b>
<b>Total:</b>	<b>\$2,899.00</b>
<b>Amount Paid:</b>	<b>\$0.00</b>
<b>Balance Due:</b>	<b>\$2,899.00</b>



777 S. Figueroa St., Ste.3850  
Los Angeles, CA 90017

Invoice submitted to:

Karnes Law Offices, PC  
Keith D. Karnes  
1860 Hawthorne Ave., Ste. 10  
Salem, OR 97301

August 07, 2019

Re: Hunsaker, *et al.* v. *United States (In re Hunsaker)* (9th Cir. and U.S.).

Invoice # 11892

Legal Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/17/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; confer with co-counsel regarding the same and logistics for the representation.	2.30 700.00/hr	1,610.00
2/18/2017	DG	Review and analyze material regarding theories and strategy for the opening brief.	1.30 700.00/hr	910.00
2/20/2017	DG	Review and analyze material regarding theories and strategy for the opening brief.	3.90 700.00/hr	2,730.00
3/13/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; enter appearance; confer with opposing counsel regarding extension request for the opening brief.	1.80 700.00/hr	1,260.00
3/15/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; draft extension request for the opening brief.	1.50 700.00/hr	1,050.00
3/16/2017	DG	Review the Court's order granting the extension request; confer with co-counsel regarding the same and next steps.	0.20 700.00/hr	140.00
3/31/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; confer with DDG regarding the same.	0.60 700.00/hr	420.00
	DDG	Review background materials.	1.00 500.00/hr	500.00
4/2/2017	DG	Confer with NACBA regarding amicus support and scheduling for the appeal.	0.30 700.00/hr	210.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/3/2017	DDG	Review background materials; research regarding availability of emotional-distress damages against the government.	5.00 500.00/hr	2,500.00
4/4/2017	DDG	Research regarding availability of emotional-distress damages before Section 106(a) amendment; research regarding legislative history of Section 106 amendment.	5.50 500.00/hr	2,750.00
4/6/2017	EB	Research regarding availability of emotional-distress damages.	2.10 700.00/hr	1,470.00
4/7/2017	DDG	Research regarding availability of emotional-distress damages.	2.10 500.00/hr	1,050.00
4/10/2017	DDG	Research regarding automatic stay and sovereign immunity; begin drafting brief.	6.90 500.00/hr	3,450.00
4/11/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; confer with DDG regarding the same.	0.90 700.00/hr	630.00
	DDG	Continue drafting brief; research regarding sovereign immunity.	4.00 500.00/hr	2,000.00
4/12/2017	DDG	Continue drafting brief.	3.60 500.00/hr	1,800.00
4/14/2017	DG	Confer with opposing counsel and co-counsel regarding a final extension on the opening brief.	0.20 700.00/hr	140.00
4/15/2017	DG	Draft the extension motion on the opening brief; confer with co-counsel, the internal team, and amicus counsel regarding the same.	0.80 700.00/hr	560.00
4/17/2017	DDG	Research regarding statutory-interpretation principles; continue drafting brief.	1.80 500.00/hr	900.00
4/18/2017	DDG	Continue drafting brief.	2.20 500.00/hr	1,100.00
4/19/2017	DG	Review the Court's order granting the extension request on the opening brief; confer with NACBA regarding the same.	0.30 700.00/hr	210.00
	DDG	Continue drafting brief; research regarding history of Section 106 and judicial interpretations of Section 106.	5.40 500.00/hr	2,700.00
4/20/2017	DDG	Continue drafting brief.	3.10 500.00/hr	1,550.00
4/21/2017	DDG	Continue drafting brief; confer with DLG regarding brief strategy.	1.20 500.00/hr	600.00
4/24/2017	DDG	Continue drafting brief.	5.10 500.00/hr	2,550.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/24/2017	DDG	Continue drafting brief.	5.10 500.00/hr	2,550.00
4/25/2017	DG	Confer with NACBA regarding amicus participation in the case.	0.50 700.00/hr	350.00
	DDG	Continue drafting brief.	3.70 500.00/hr	1,850.00
5/2/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; revise the same; confer with DDG regarding the same; confer with NACBA regarding the brief and NACBA's amicus brief.	2.80 700.00/hr	1,960.00
	DDG	Review edits to draft; confer with DLG regarding strategy for brief.	0.20 500.00/hr	100.00
5/3/2017	DG	Confer with DDG regarding theories and strategy for the opening brief; review and analyze material regarding the same.	0.40 700.00/hr	280.00
5/15/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; revise the same; confer with DDG regarding the same; confer with NACBA regarding the same.	1.30 700.00/hr	910.00
	DDG	Review draft of brief; e-mails to DLG regarding possible revisions.	0.90 500.00/hr	450.00
5/16/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; revise the same; confer with DDG regarding the same.	8.50 700.00/hr	5,950.00
	DDG	Confer with DLG regarding brief revisions; review research.	0.20 500.00/hr	100.00
5/17/2017	DG	Review and analyze material regarding theories and strategy for the opening brief; revise the same; confer with DDG regarding the same; confer with NACBA regarding the same; prepare the record excerpts.	8.70 700.00/hr	6,090.00
	DDG	Review and revise brief; confer with DLG regarding revisions.	0.70 500.00/hr	350.00
5/18/2017	DG	Review CA9 order filing opening brief and ordering paper copies of opening brief and record excerpts; arrange for paper copies of the same.	0.50 700.00/hr	350.00
5/23/2017	DG	Review and analyze NACBA's amicus brief; confer with NACBA and DDG regarding the same.	0.40 700.00/hr	280.00
6/2/2017	DG	Confer with opposing counsel regarding the government's extension request for its answering brief.	0.20 700.00/hr	140.00
6/5/2017	DG	Confer with opposing counsel regarding the government's extension request for the answering brief.	0.20 700.00/hr	140.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2017	DG	Review and analyze material regarding theories and strategy for the reply brief; confer with the internal team, co-counsel, and NACBA regarding the same.	1.30 700.00/hr	910.00
7/21/2017	DG	Confer with opposing counsel regarding the extension request for the reply brief; confer with DDG regarding the same.	0.20 700.00/hr	140.00
7/24/2017	DG	Confer with opposing counsel regarding our extension request for the reply brief; confirm proposed deadline for reply brief.	0.20 700.00/hr	140.00
7/25/2017	DG	Confer with opposing counsel regarding our extension request for the reply brief; submit streamlined extension request.	0.30 700.00/hr	210.00
8/14/2017	DDG	Review prior briefing; research regarding theories for reply brief, including other cases awarding emotional-distress damages and standard of review; review record.	7.10 500.00/hr	3,550.00
8/15/2017	DDG	Research regarding theories for reply brief, including other cases awarding emotional-distress damages.	0.80 500.00/hr	400.00
8/16/2017	DDG	Research regarding theories for reply brief, including meaning of "recovery" and damages awarded under Section 362(k).	1.70 500.00/hr	850.00
8/17/2017	DDG	Research regarding theories for reply brief, including meaning of "recovery" and damages awarded under Section 362(k).	0.50 500.00/hr	250.00
8/18/2017	DG	Confer with DDG regarding theories and strategy for the reply brief; review and analyze material regarding the same.	0.70 700.00/hr	490.00
	DDG	Begin drafting brief; research regarding theories for reply brief; confer with DLG regarding brief strategy.	6.50 500.00/hr	3,250.00
8/21/2017	DDG	Research regarding meaning of "recovery"; confer with NS regarding research project.	0.20 500.00/hr	100.00
	NS	Research Bankruptcy Code for references to monetary awards for DG in preparation for Ninth Circuit Appeal.	6.40 150.00/hr	960.00
8/22/2017	DDG	Continue drafting reply brief.	2.40 500.00/hr	1,200.00
	NS	Finalize research on Bankruptcy Code.	2.80 150.00/hr	420.00
8/23/2017	DDG	Continue drafting reply brief; research regarding meaning of "recovery".	4.90 500.00/hr	2,450.00
8/24/2017	DDG	Continue drafting reply brief; research regarding theories for reply brief; review record.	6.40 500.00/hr	3,200.00
8/25/2017	DDG	Continue drafting reply brief; research regarding theories for reply brief.	7.00 500.00/hr	3,500.00



			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2017	DDG	Continue drafting reply brief.	2.00 500.00/hr	1,000.00
8/29/2017	DDG	Continue drafting reply brief.	4.80 500.00/hr	2,400.00
8/30/2017	DDG	Continue drafting reply brief.	3.70 500.00/hr	1,850.00
9/1/2017	DDG	Continue drafting reply brief.	2.50 500.00/hr	1,250.00
9/4/2017	DDG	Continue drafting reply brief.	2.50 500.00/hr	1,250.00
9/5/2017	DDG	Continue drafting reply brief.	7.10 500.00/hr	3,550.00
9/6/2017	DG	Review and analyze material regarding theories and strategy for the reply brief; revise the same; confer with DDG regarding the same; confer with co-counsel and amicus regarding the same.	7.10 700.00/hr	4,970.00
	DDG	Confer with DLG regarding reply brief; revise and finalize reply brief.	1.00 500.00/hr	500.00
9/7/2017	DG	Review the CA9's order accepting the reply brief for filing; arrange for printing, serving, and filing the paper copies of the reply brief.	0.40 700.00/hr	280.00
1/29/2018	DG	Review the Court's order tentatively calendaring the case for argument; confer with DDG and co-counsel regarding the same.	0.40 700.00/hr	280.00
3/12/2018	DDG	Update research.	1.00 500.00/hr	500.00
4/25/2018	DDG	Emails to team regarding scheduling moots.	0.10 500.00/hr	50.00
5/3/2018	DDG	Review briefing; update research; review case law and statutory provisions.	3.90 500.00/hr	1,950.00
5/4/2018	DDG	Prepare for argument.	7.90 500.00/hr	3,950.00
5/7/2018	DDG	Prepare for argument.	7.50 500.00/hr	3,750.00
5/8/2018	EB	Prepare for moot.	1.00 700.00/hr	700.00
	MD	Review briefing and prep for moot court session.	1.50 600.00/hr	900.00
	DDG	Prepare for argument.	7.20 500.00/hr	3,600.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2018	MD	Participate in moot court session.	1.00 600.00/hr	600.00
	DDG	Prepare for argument; participate in moot.	8.00 500.00/hr	4,000.00
5/10/2018	DDG	Prepare for argument.	7.30 500.00/hr	3,650.00
5/11/2018	EB	Prepare for and attend second moot.	1.20 700.00/hr	840.00
	MD	Participate in moot court session.	0.70 600.00/hr	420.00
	DDG	Prepare for argument; participate in moot.	8.10 500.00/hr	4,050.00
5/14/2018	DDG	Travel to Portland for argument; prepare for argument.	8.50 500.00/hr	4,250.00
5/15/2018	DDG	Prepare for argument; present argument; travel back from argument.	7.00 500.00/hr	3,500.00
		Total for legal services rendered	250.20	\$132,700.00
		Expenses:		
5/25/2017		Professional printing of Appellants Brief and Excerpts of Record.		615.03
9/14/2017		Research (Pacer).		39.80
		Professional printing of Reply Brief.		449.81
5/14/2018	DDG	airfare and lodging for argument in Portland.		600.49
		Total expense charges		\$1,705.13
		Total amount of this bill		\$134,405.13

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Elizabeth Brannen	4.30	700.00	\$3,010.00
Daniel L. Geyser	48.20	700.00	\$33,740.00
Michael Donofrio	3.20	600.00	\$1,920.00
Douglas D. Geyser	185.30	500.00	\$92,650.00
Nathan Small	9.20	150.00	\$1,380.00

Jonathon Eldon Hunsaker  
Cheryl Lynn Hunsaker  
c/o Keith D. Karnes  
keith@rankkarneslaw.com

August 7, 2019  
Invoice No. 1018

## FOR PROFESSIONAL SERVICES

*Hunsaker, et al. v. United States (In re Hunsaker)* : Appellate litigation

### Legal Services:

Date	Attorney	Description	Rate	Hours	Total
5/7/2018	DLG	Confer with D. Geyser regarding theories and strategy for oral argument; review and analyze material regarding the same.	\$700.00	0.90	\$630.00
5/8/2018	DLG	Confer with D. Geyser regarding theories and strategy for oral argument; review and analyze material regarding the same.	\$700.00	1.20	\$840.00
5/9/2018	DLG	Review and analyze material regarding theories and strategy for oral argument; participate in moot with the internal team.	\$700.00	2.30	\$1,610.00
8/30/2018	DLG	Review and analyze the Ninth Circuit's opinion; confer with co-counsel regarding strategy and logistics for next steps.	\$700.00	0.90	\$630.00
10/1/2018	DLG	Confer with opposing counsel regarding the government's extension request for seeking rehearing; confer with co-counsel regarding rehearing and settlement strategy and logistics.	\$700.00	0.40	\$280.00
6/25/2019	DLG	Review the district court's opinion on remand; confer with co-counsel regarding strategy for next steps.	\$795.00	0.70	\$556.50

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<b>Total for legal services rendered:</b>	<b>6.40</b>	<b>\$4,546.50</b>
<b>Total bill due upon receipt:</b>		<b>\$4,546.50</b>